

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

LAURA ALLEN, INDIVIDUALLY AND AS  
ADMINISTRATRIX OF THE ESTATE OF  
DAN ALLEN, AND AS NEXT FRIEND  
TAYLOR ALLEN AND DANIELLE ALLEN;  
AND MARK ALLEN

Plaintiffs,

v.

MARTIN SURFACING, A Division of  
SOUTHWEST RECREATIONAL  
INDUSTRIES, INC; SOUTHWEST  
RECREATIONAL INDUSTRIES, INC .,  
d/b/a MARTIN SURFACING;

Defendants.

CIVIL ACTION  
NO. 05-40048-FDS

**PLAINTIFFS' SUPPLEMENTAL DISCLOSURES**  
**PURSUANT TO FED. R. CIV. P. 26(a) AND LOCAL RULE 26.2**

NOW COMES the Plaintiffs and makes the following as their Supplemental  
Disclosures:

1. Rule (26.1(b)(2)(a): All Persons Known to this Defendant, Who Witnessed the Occurrence or Have Substantial Discoverable Information Regarding Same:

**WITNESSES**

1. Reed J. Seaton
2. Robert N. Wolensky
3. Ronald Ryba
4. Dennis Allen
5. Laura Allen
6. Taylor Allen
7. Danielle Allen
8. Mark Allen
9. Persons presently or previously associated with the College of the Holy Cross:
  - i. Richard M. Regan, Jr.

- ii. Scott M. Merrill
  - iii. William J. Conley
  - iv. William R. Durgin
  - v. Rev. Dennis J. Yesalonia, S.J.
  - vi. Patricia Morrisette
  - vii. Gerald A. Zimmermann
  - viii. Lenny Raymond
  - ix. Paul Bachia
  - x. Bob Bradley
  - xi. Jim Cavanaugh
  - xii. Henry Corazini
  - xiii. Leo Fanning
  - xiv. Meg Gallagher
  - xv. Linda George
  - xvi. Bob Griffin
  - xvii. Lee Hall
  - xviii. Mary Herard
  - xix. Larry Napolitano
  - xx. Bob Neville
  - xxi. Mike Pedone
  - xxii. Nina Robinson
  - xxiii. Vinny Sinagra
  - xxiv. Ann Zelesky
10. Persons presently or previously associated with Southwest Recreational Industries, Inc. d/b/a Martin Surfacing:
- i. Dick McFadden
  - ii. Jack McCann
  - iii. John T. Beynor
  - iv. Harry Coke
  - v. Mike Palmer
  - vi. Ron Ryba
11. Medical Providers:
- i. Marcie Wolinsky-Friedland, M.D.
  - ii. Richard A. Palken, M.D.
  - iii. George Zabrecky, M.D.
  - iv. Nicholas Smyrnios, M.D.
  - v. Mary Kay O'Connor

Plaintiffs reserve the right to supplement their witness list.

2. Rule (26.1(b)(2)(b): All Opposing Parties from whom Statements Have Been Taken: \_\_\_\_\_

None.

3. Rule (26.1(b)(2)(b): All Government Agencies Known to Have  
Investigated Occurrence:

None.

4. **DOCUMENTS**

1. Medical Records  
Bates Stamped 000231 - 000659
2. Documents received from the College of the Holy Cross  
Bates Stamped 000001 – 000230
3. Death Certificate

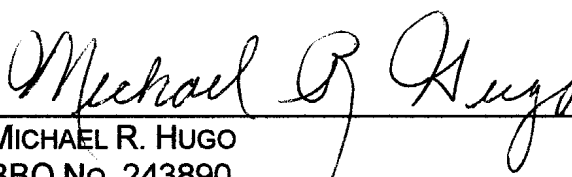
RESPECTFULLY SUBMITTED  
THE PLAINTIFFS  
BY THEIR ATTORNEYS



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AND



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MICHAEL R. HUGO  
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